

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

IN Re:

VIKRAM SAGAR PASALA

Debtor.

Case no: 24-44296
Chapter: 13
Judge Mark Randon

DEBTOR'S RESPONSE TO TRUSTEE'S OBJECTION TO MOTION TO REINSTATE
CASE

COMES NOW The Debtor, thru his Counsel to address each of the Trustees objections as follows:

In summary, the Trustee noted the following deficiencies in debtors' filings in her objections:

- a) Lack of paystubs dated 60 days prior to 341 meeting.
- b) Lack of 2023 Tax returns for the Debtor.
- c) Past Due plan payments.
- d) 2004 Exam documents

Accordingly, the Debtor responds as follows:

1. Paystubs issue:

- a) Debtor started his employment on or about April 1, 2024, and gets paid monthly. Since he was not employed prior to April 2024, he could not have possibly complied with 11 U.S.C. 521(a)(1)(iv).
- b) Debtor's first paycheck was received on or about May 9, 2024, which was for pay period for the month of April 2024, which he provided on June 14, 2024, along with the second paystub for the month of May 2024.
- c) Debtor now has provided pay stubs for each pay period, including June, July of 2024. (Exhibit "A")

2. Tax Returns issue:

- d) At the time of initial filing, Debtor had provided his 2022 tax return and proof of extension filed for 2023 returns, subsequent to that, he has provided the 2024 as well.

3. Plan Payment Issue:

- e) Debtor had tried on numerous occasions to pay the plan payment thru the Chapter 13 Trustee's payment portal, but this occurred during the time the

bankruptcy case was dismissed and despite a concerted effort between Counsel's office and the Debtor, an electronic payment was not accepted, as the case showed dismissed and therefore could not be processed. Per Trustee's office direction, a cashier's check was sent to the Trustee's lockbox on 08/12/2024.

- f) Debtor has now made the 2 additional payments directly to the Trustee's lockbox in Memphis and is therefore current on plan payments. (Exhibit "B")

4. Undisclosed Interest Issue:

- g) Counsel has now submitted an amended Statement of Financial Affairs on behalf of the debtor and adjusted it according to his now filed tax returns. (Exhibit "C")



Abdul Arif – P70624
1735 W 21st St, Ste 200
Wichita, KS 67203
(316)300-3000
Attorney for Debtor

Exhibit A

Bankruptcy Documents | Filer Account

Received	Type	Serial Number	Size	Comment	Original Filename
2024-07-26 17:04:33	Debtor Identity Verification	DOC1300000000004712572	601035 KB	RESUBMISSION OF IDENTITY CARD	doc20240726160255.pdf
2024-07-23 14:58:52	Debtor Identity Verification	DOC1300000000004701350	586051 KB	Social Security Card	Pasala ss#.pdf
2024-07-19 16:59:55	2023 - Federal Income Tax Returns	DOC1300000000004694112	11231745 MB	FILED AND COMPLETED 2023 TAXES	Pasala 2023 Taxes.pdf
2024-07-05 12:26:57	2023 - Federal Income Tax Returns	DOC1300000000004652517	309168 KB	Debtor has not yet filed his 2023 taxes. Attached is his application for extension	doc20240705112545.pdf
2024-07-05 12:39:12	Debtor Identity Verification	DOC1300000000004652542	528796 KB	Social Security Number. Debtor has since changed his name.	SS#.pdf
2024-07-05 12:12:16	Pay Check Stubs	DOC1300000000004652463	40157 KB	April Paystub	Vikram Pasala April 2024 Paystub.pdf
2024-07-05 12:12:17	Pay Check Stubs	DOC1300000000004652464	98673 KB	May Paystub	Vikram Pasala May 2024 Paystub.pdf
2024-06-21 16:11:21	Debtor Identity Verification	DOC1300000000004620702	283440 KB		Sagar Sir Driving Licence (1).pdf
2024-06-21 15:54:44	2022 - Federal Income Tax Returns	DOC1300000000004620656	10078681 MB		Pasala Taxes.pdf

Certification of Document Receipt

BANKRUPTCY DOCUMENTS HAS RECEIVED YOUR FILE

Document serial number: DOC130000000004757237

This is the serial number which has been assigned to your document. Use the serial number to reference this upload with the Trustee or Bankruptcy Documents staff.

Case Number: 2444296

Original Filename:	Sagar June 2024 Paycheck.pdf (Original file name is displayed for informational purposes only.)
Received Date:	Monday, August 12th 04:53:03 PM (local)
Document Type:	Pay Check Stubs
Uploaded by:	Abdul Q Arif <abdul.arif@gmail.com>
In-Transit for:	Krispen Carroll 719 Griswold Suite 1100 Detroit, MI 48226 P: (phone) +1 (313) 963-4315

Bankruptcy Documents does not make any guarantee to the accuracy of the information provided by the filer for any purpose.

NOTICE

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Pay Check Stubs

Abdul Q Arif <abdul.arif@gmail.com>

Krispen Carroll

719 Griswold

Suite 1100

Detroit, MI 48226

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Exhibit B



GREENMEAD
37500 PEMBROKE AVE
LIVONIA, MI 48152-9998
(800) 275-8777

08/12/2024

12:25 PM

Product	Qty	Unit Price	Price
PM Express 1-Day	1		\$30.45
Flat Rate Env			
Memphis, TN 38101			
Flat Rate			
Signature Waiver			
Scheduled Delivery Date			
Tue 08/13/2024 06:00 PM			
Money Back Guarantee			
Tracking #:			
EI260773966US			
Insurance			\$0.00
Up to \$100.00 included			
Total			\$30.45
Rate Inquiries	1		\$0.00
Rate Inquiries	1		\$0.00
Grand Total:			\$30.45
Debit Card Remit			\$30.45
Card Name: MasterCard			
Account #: XXXXXXXXXXXX0244			
Approval #: 172552			
Transaction #: 939			
Receipt #: 040624			
Debit Card Purchase: \$30.45			
AID: A0000000042203			Contactless
AL: US Debit			

In a hurry? Self-service kiosks offer



OFFICIAL CHECK

50-7100
2260

500392883

Date: August 12, 2024

\$ *****3,800.00

PAY Three Thousand Eight Hundred and 00/100*****

PAY TO THE Chapter 13 Trustee Krispen S Carroll
ORDER OF

MEMO: _____

Issued by flagstar
1-888-248-6423

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑈500392883⑈ ⑆226071004⑆ 344145⑈



CUSTOMER COPY

Date: August 12, 2024

Account Detail
Vikram S. Pasala

Account #
5730

Amount
*****3,800.00

Balance
813.06

Payee Chapter 13 Trustee Krispen S Carroll

Official Check

Chk 500392883

August 12, 2024

Br 2051 Amt *****3,800.00

MEMO: _____

MO4-0014



OFFICIAL CHECK

50-7100
2260

500392878

Date: August 12, 2024

\$ *****3,800.00

PAY Three Thousand Eight Hundred and 00/100*****

PAY TO THE Chapter 13 Trustee Krispen S Carroll
ORDER OF

MEMO: _____

Issued by flagstar
1-888-248-6423

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑈500392878⑈ ⑆226071004⑆ 344145⑈



CUSTOMER COPY

Date: August 12, 2024

Account Detail

Account #

Amount

Balance

Vikram S. Pasala

5730

*****3,800.00

4,621.06

Payee Chapter 13 Trustee Krispen S Carroll

Official Check

Chk 500392878

August 12, 2024

Br 2051 Amt *****3,800.00

MEMO: _____

MQ4-0014

Exhibit C

Miscellaneous:24-44296-mar Vikram Sagar Pasala Debtor dismissed 07/11/2024

Type: bk Chapter: 13 v Office: 2 (Detroit)
Assets: y Debtor disposition: Dismissed Judge: mar
for Other Reason

Case Flag: DebtEd, DSODUE, NonAttyBKPP, CASECHECKED, REINSTATED, DISMISSED

U.S. Bankruptcy Court**Eastern District of Michigan**

Notice of Electronic Filing

The following transaction was received from Abdul Q Arif entered on 8/12/2024 at 5:26 PM EDT and filed on 8/12/2024

Case Name: Vikram Sagar Pasala**Case Number:** 24-44296-mar**Document Number:** 76**Docket Text:**Statement of Financial Affairs for Individuals Filing for Bankruptcy *AMENDED* Filed by Debtor Vikram Sagar Pasala. (Arif, Abdul)

The following document(s) are associated with this transaction:

Document description:Main Document**Original filename:**Statement of Financial Affairs.pdf**Electronic document Stamp:**

[STAMP bkecfStamp_ID=1068232149 [Date=8/12/2024] [FileNumber=68950071-0] [ce01fd6055e53065872177f26e306e3ff1ca0f792160bc77de1bae85f1576fd312c785eef2cec5854fd7994b171ebfc8b32d1bca853b612fc2d56974762a54e8]]

24-44296-mar Notice will be electronically mailed to:

Abdul Q Arif on behalf of Debtor Vikram Sagar Pasala
abdul.arif@gmail.com

Krispen S. Carroll
notice@det13ksc.com

Kimberly Ross Clayson on behalf of Creditor Oxford Commercial Finance
kclayson@taftlaw.com, ttorni@taftlaw.com;DET_Docket_Assist@taftlaw.com

Greg Dickinson on behalf of Creditor United States of America (IRS)
gregory.dickinson@usdoj.gov,
gdickinson@usa.doj.gov;karen.ducharme@usdoj.gov;sdelozier@usa.doj.gov;Mgangler@usa.doj.gov;Aida.Garmo@usdoj.gov;CaseView.ECF@usdoj.gov

John Polderman on behalf of Other Professional Charles D Bullock
jpolderman@sbplclaw.com, simondocket@simonattys.com;jlassen@simonattys.com

Karen L. Rowse-Oberle on behalf of Creditor DFCU
krowse-oberle@brolawpllc.com, krowseoberle@gmail.com

Karen L. Rowse-Oberle on behalf of Creditor DFCU Financial
krowse-oberle@brolawpllc.com, krowseoberle@gmail.com

24-44296-mar Notice will not be electronically mailed to:

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

IN R:

VIKRAM SAGAR PASALA

Debtor.

Case no: 24-44296

Chapter: 13

Judge: Randon

ORDER GRANTING MOTION TO REINSTATE CASE

This matter having come before the Court on Debtor's motion, the court having considered the motion, and having found cause:

IT IS ORDERED that the stipulation is granted

Judge Mark A. Randon